

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
Greenbelt Division**

In re:

\*

MOHAMMAD R. PISHVA  
SUSAN PISHVA

Case No.: 15-11441-PM

\*

Chapter 13

Debtors

\*

\*      \*      \*      \*      \*      \*

RBS CITIZENS, N.A.

\*

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Movant

\*

vs.

\*

MOHAMMAD R. PISHVA, *et al.*

\*

Respondent

\*

\*      \*      \*      \*      \*      \*

**RESPONSE TO MOTION SEEKING RELIEF FROM AUTOMATIC STAY AND TO RECLAIM  
PROPERTY (2011 Volkswagen Jetta)**

Mohammad R. Pishva and Susan Pishva (“Debtors”), through their counsel, Adam B. Ross and the Law Office of Richard B. Rosenblatt, P.C., files this Response to the Motion Seeking Relief from Automatic Stay and to Reclaim Property (2011 Volkswagen Jetta) filed by RBS Citizens, N.A. hereinafter “RBS” and states:

1.      Admit.
2.      Admit.
3.      Admit.
4.      Admit.
5.      The Document referenced in this paragraph speaks for itself.
6.      The Document referenced in this paragraph speaks for itself.
7.      Denied.
8.      Denied.

9. Denied.
10. Denied.
11. Denied.
12. Denied.
13. All allegations are either admitted or denied.

**WHEREFORE**, Debtor respectfully request that this Court:

- A. Deny RBS's Motion for Relief from the Automatic Stay; and
- B. Grant such other and further relief as justice and equity demand.

/s/ Adam B. Ross

Adam B. Ross, Fed. Bar No. 28782  
The Law Offices of Richard B. Rosenblatt, PC  
30 Courthouse Square, Suite 302  
Rockville, MD 20850  
(301) 838-0098

**CERTIFICATE OF SERVICE**

I CERTIFY that on that on August 14, 2015, I served a copy of the Response to Motion for Relief From Automatic Stay electronically to those recipients authorized to receive a Notice of Electronic Filing by the Court, and/or by first-class mail, postage prepaid, on:

Movant's Counsel

Chapter 13 Trustee

/s/ Adam B. Ross

Adam B. Ross